

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and
HELEN LOVELACE, Individually, and as Parents of
BRETT LOVELACE, deceased,

Plaintiffs,

VS.

NO.: 2:13-cv-02289 JPM-dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and,
MARK P. CLEMONS,

Defendants.

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION OF
DEFENDANTS, PEDIATRIC ANESTHESIOLOGISTS, P.A. AND BABU RAO
PAIDIPALLI, M.D., TO DISMISS FOR FAILURE TO STATE A CLAIM UPON WHICH
RELIEF CAN BE GRANTED PURSUANT TO F.R.C.P. 12(b) AND MEMORANDUM OF
LAW IN SUPPORT OF DEFENDANTS, PEDIATRIC ANESTHESIOLOGISTS, P.A. AND
BABU RAO PAIDIPALLI, M.D., TO DISMISS FOR FAILURE TO STATE A CLAIM
UPON WHICH RELIEF CAN BE GRANTED PURSUANT TO F.R.C.P. 12(B)**

Come the Plaintiffs, Daniel Lovelace and Helen Lovelace, Individually, and as Parents of
Brett Lovelace, deceased, by counsel, and for their Motion for Extension of Time to Respond to
Motion of Defendants, Pediatric Anesthesiologists, P.A. and Babu Rao Paidipalli, M.D., to
Dismiss for Failure to State a Claim Upon Which Relief Can Be Granted Pursuant To F.R.C.P.
12(b) [D.E. 12], and Memorandum of Law in Support of Defendants, Pediatric Anesthesiologists,
P.A. and Babu Rao Paidipalli, M.D., to Dismiss for Failure to State a Claim Upon Which Relief
Can Be Granted Pursuant To F.R.C.P. 12(b) [D.E.12-1], filed on June 12, 2013, would state:

1. Counsel for Plaintiffs currently has several briefs in other courts due at this time and is pressed for time to respond to all of same in a thorough and timely manner.
2. Under these circumstances, counsel respectfully requests additional time until July 19, 2013 within which to respond to the above cited pleadings.
3. Extensions of time should be freely granted in the interest of justice.
4. Opposing counsel has no objection to the relief requested.

WHEREFORE, PREMISES CONSIDERED, PLAINTIFF PRAYS for the relief requested herein.

Respectfully submitted,

HALLIBURTON & LEDBETTER



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system

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This 3rd day of July, 2013.

A handwritten signature in blue ink, appearing to read "Mark Ledbetter", with a stylized flourish at the end.

MARK LEDBETTER, Certifying Attorney